

REMARKS/ARGUMENTS

The claimed invention pertains to techniques for invocation of native methods from a platform-independent programming environment (e.g., the Java computing environment) (see, for example, Abstract of the invention). It is respectfully submitted that it is well known in the art that a native method (functions or procedures) is typically written in a platform specific programming language (please, also see specification, page 2, lines 5-13). As such, no claim amendment is needed. Nevertheless, solely in order to further clarify the subject matter regarded as the claimed invention, claims 1, 21 and 24 have been amended to recite that a native method is written in a native programming language. Also, claims 1, 10, 21 and 24 have been amended to improve the readability of the claim language. No substantive claim amendment has been made. However, new claims 27-30 have been added. These new claims also pertain to invoking a native method from a platform-independent program (e.g., the Java program). Claims 1-14 and 21-30 are now pending.

In the Office Action, the Examiner withdrew the rejection of claims under 35 U.S.C. §102(e) as being anticipated by U.S. Patent No. 6,481,006 (*Blandy et al.*). However, the Examiner has rejected claims 1-14 and 21-26 claims under 35 U.S.C. §103(a) as being obvious in view of *Blandy et al.* This rejection is fully traversed below.

As noted by the Examiner, *Blandy et al.* does NOT teach invoking a native method from a Java programming environment (Office Action, page 3). In fact, *Blandy et al.* addresses the reverse process, namely, invocation of Java methods from native code (*Blandy et al.*, Abstract). Nevertheless, the Examiner seems to be asserting that one of ordinary skill in the art would conclude that the method of *Blandy et al.* may be used to invoke a native language from the Java programming language (Office Action, page 3). To support this assertion, the Examiner has noted that *Blandy et al.* states that its methodology may be applied to other programming languages (Office Action, page 3). It is noted that *Blandy et al.* states that its invention may be used by interpretable methods other than Java (*Blandy et al.*, col 10, line 67 to col 11, line 1). However, it should also be noted that *Blandy et al.* means that invocation of another platform-independent (other than Java) method from native code can be accomplished using the techniques of *Blandy et al.* This assertion, however, does NOT change the fact the *Blandy et al.* describes invocation of a platform-independent method, namely a Java programming method, from native code, and not the other way around (i.e., invocation of a native method from a platform-independent environment). As such, it is very respectfully submitted that *Blandy et al.*

addresses the reverse process of the claimed invention (i.e., claimed invocation of a native method from a platform-independent programming environment). Accordingly, it is respectfully submitted that *Blandy et al.* does NOT teach or suggest the claimed invention.

More particularly, it is respectfully submitted that *Blandy et al.* does NOT teach or suggested suggest: (a) providing a reference to one or more Java parameters associated with a native method. It should be noted that the one or more parameters stored on the Java stack are Java parameters that can be used to invoke a native method (e.g., parameters that need to be passed to the native method, for example, as input). The provided reference can be used to generate one or more native parameters. These native parameters are, in turn, used as parameters for invoking the native method when the native method is invoked (e.g., native parameters that are placed on a native execution stack when the native method is invoked). It is also respectfully submitted that *Blandy et al.* also fails to teach or suggest: (b) generating the native parameters, and (c) invoking the native method using the native parameters.

Claim 1 recites all of these features (a, b, and c). Accordingly, it is respectfully submitted that claim 1 is patentable over *Blandy et al.* for these reasons. In addition, claims that are dependent on claim 1 are also patentable over *Blandy et al.* for at least these reasons alone.

Moreover, these dependent claims recite additional features that render them patentable for additional reasons. For example, claim 5 additionally recites converting at least one of the Java Parameters to a native parameter. Again, it is noted that *Blandy et al.* describes converting native parameters to Java parameters. However, contrary to the Examiner's assertion, *Blandy et al.* does NOT teach or suggest converting Java parameters into native parameters. Instead, conversion of native parameter to Java Parameters are used by the methodology taught by *Blandy et al.* to facilitate invocation of Java methods from native codes. This is also evident because *Blandy et al.* pertains to invocation of Java methods from native code and NOT invocation of native methods from Java. Thus, claim 5 is patentable over *Blandy et al.* for additional reasons.

Independent claim 10, among other things, recites providing a reference to Java parameters associated with a native method, and using the reference to convert them into native. Accordingly, it is respectfully submitted that claim 10 and its dependent claims are also patentable over *Blandy et al.* for similar reasons as discussed above. Although independent claims 21 and 24 respectively pertain to a computer readable medium and a computer system, these claims recite similar features as claim 1. It should be noted that new claims 27-30 recite similar features as recited in claim 1.

Based on the foregoing, it is submitted that claims 1-14 and 21-30 are patentably distinct over the cited art of record. Additional limitations recited in the independent claims or the dependent claims are not further discussed because the limitations discussed above are sufficient to distinguish the claimed invention from the cited art. Accordingly, Applicant believes that all pending claims are allowable and respectfully requests a Notice of Allowance for this application from the Examiner.

Applicants hereby petition for an extension of time which may be required to maintain the pendency of this case, and any required fee for such extension or any further fee required in connection with the filing of this Amendment is to be charged to Deposit Account No. 500388 (Order No. SUN1P829). Should the Examiner believe that a telephone conference would expedite the prosecution of this application, the undersigned can be reached at the telephone number set out below.

Respectfully submitted,
BEYER WEAVER & THOMAS, LLP



R. Mahboubian
Reg. No. 44,890

P.O. Box 778
Berkeley, CA 94704-0778
(650) 961-8300